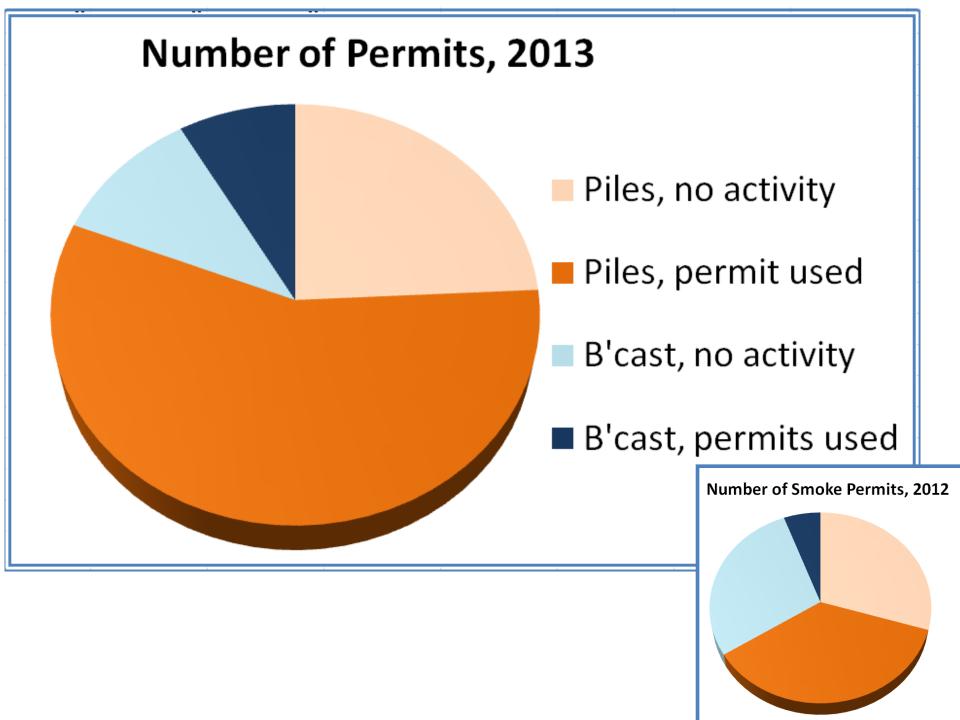
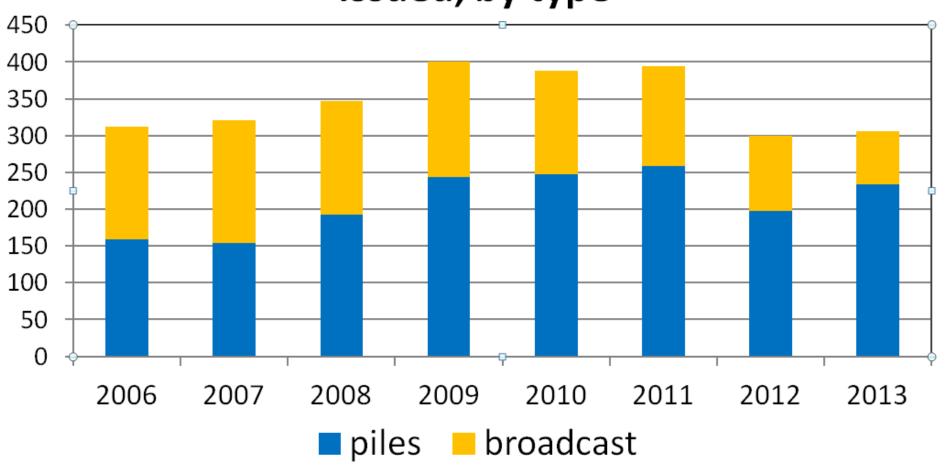


Totals, Colo Rx Fire

2012		2013
4,254	Acres burned	18,544
16,800,000	Ft ³ of piles burned	24,400,000
36,135	count of piles burned	40,193
300	permits issued	306
139	permits with activity	188

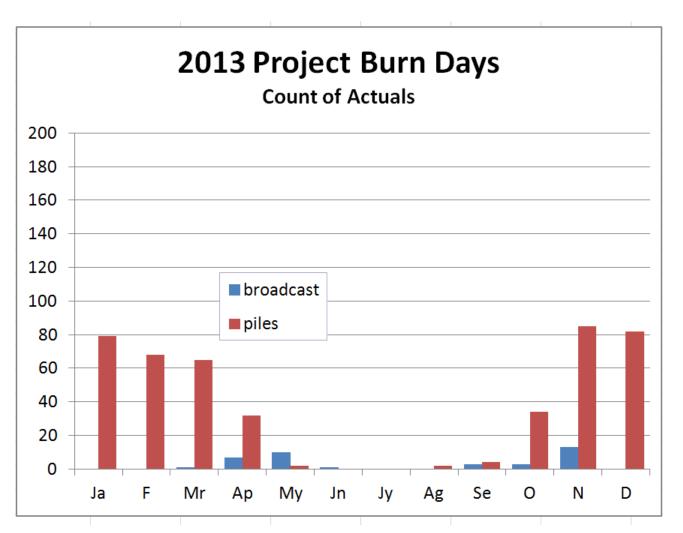


Number of Smoke Management Permits Issued, by type



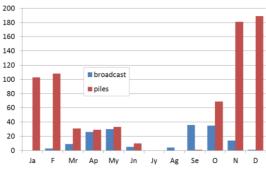
Colorado Smoke Permits, 2013

Agency	# Broadcast Permits	# Pile Permits	Acres Burned	Pile ft3 Consumed
Army/other military	4	2	13,043	167,000
Bureau Land Mgt	11	26	337	1,205,000
Local Government	4	12		3,000
Misc. fed & non-profit	1	11		200,000
Multiple Agencies	3		1,300	
National Park Service	2	11		209,000
Private Land	2	21		7,335,000
US Fish & Wildlife Svc	5	3	938	<1,000
US Forest Service	40	148	2,926	15,200,000

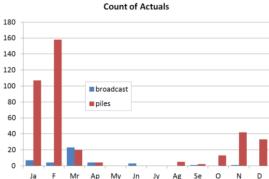


2011 Project Burn Days



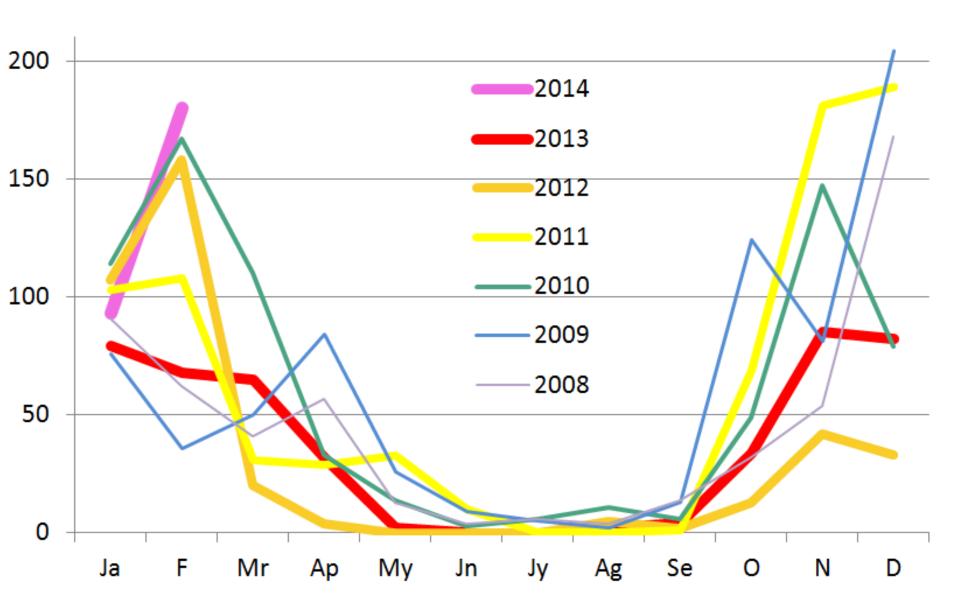


2012 Project Burn Days



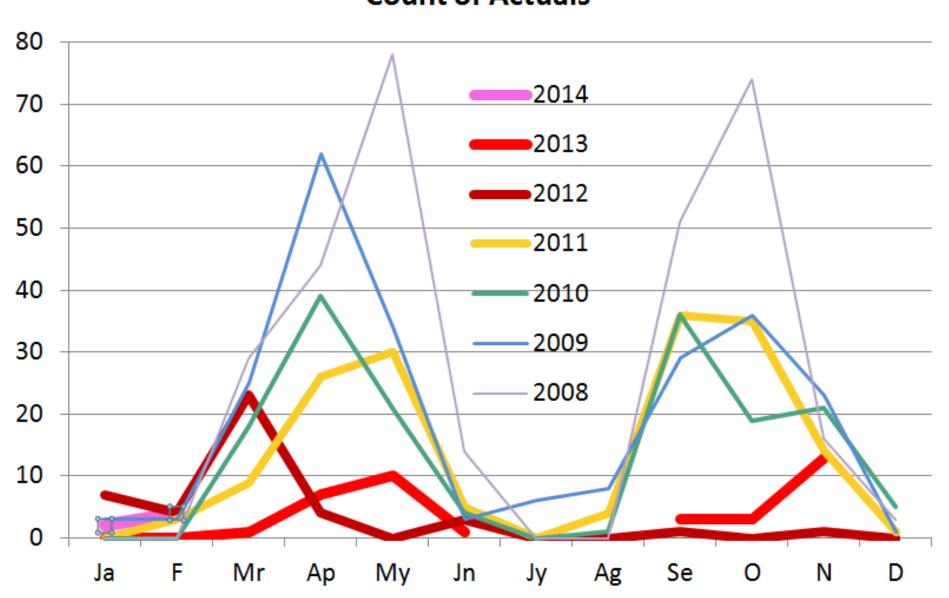
Pile Burn Days

Count of Actuals

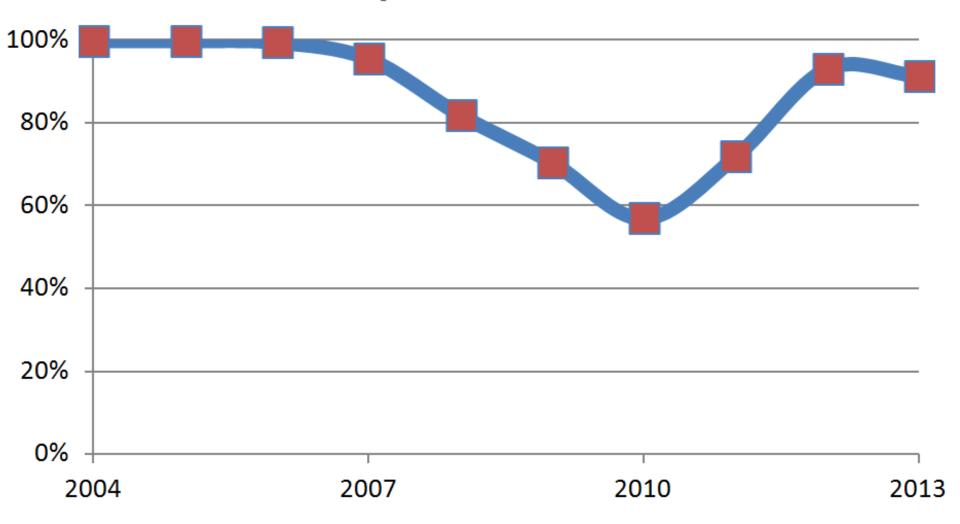


Broadcast Burn Days

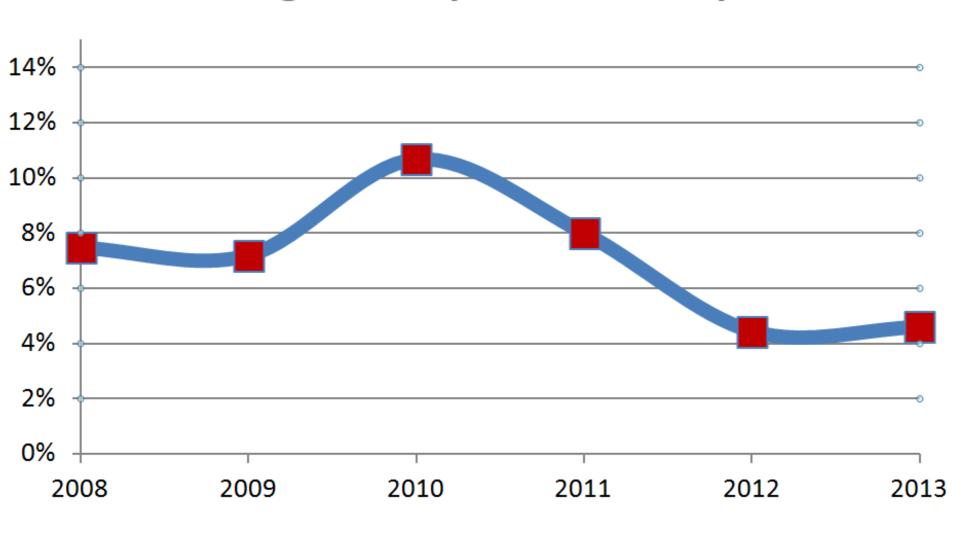
Count of Actuals



Completed annuals



Missing Accomplishment Reports

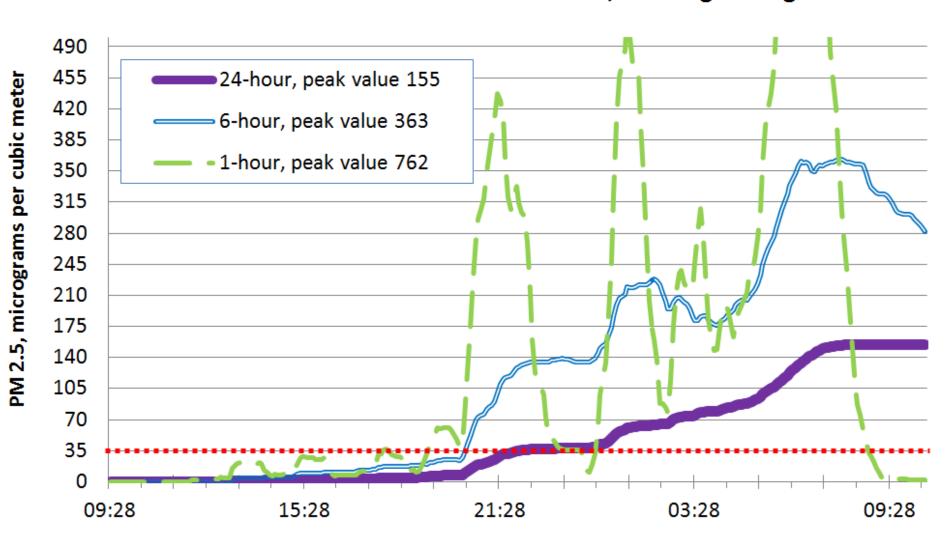


Broadcast PM Data

- Trying to instrument more, as USFS requested.
- Conditions for understory burns near homes have been focus of greatest contention.
- Instrumented 2 burns in November
 - Normal fuels for Colorado
 - Half as many acres / day as standard conditions
 - 24-hour PM2.5 WAY over level of NAAQS

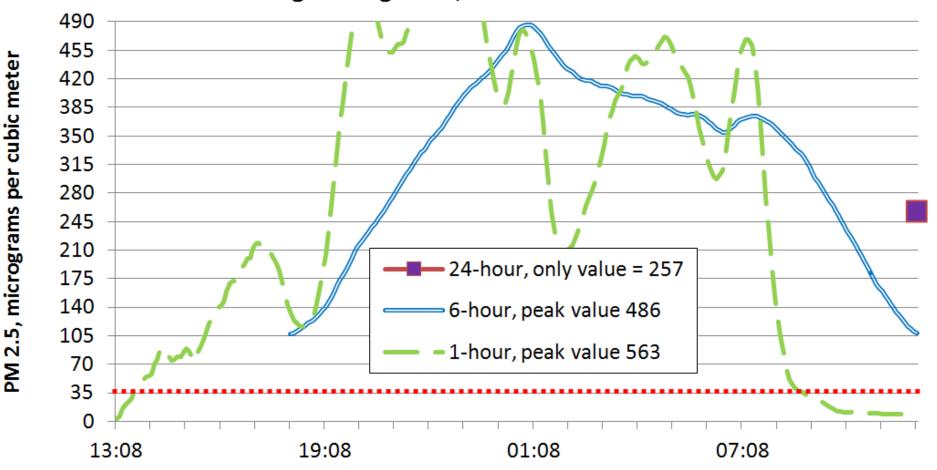
Ex.1: north of Buena Vista

Four Elk Particulate Concentrations, Running Averages



Ex.2: south of Lake George

Particulate Concentrations, Running Averages Wagon Tongue P4, 0.3 mi downstream



High PM at Two Fall Broadcast Units

- Distances from fireline measured:
 - (Buena Vista) home ~150'
 - (Lake George) 0.3 miles = median for 3c rural
- APCD staff were surprised!
 - Had thought a few big burns slightly over NAAQS
- Anticipate more instrumentation in spring

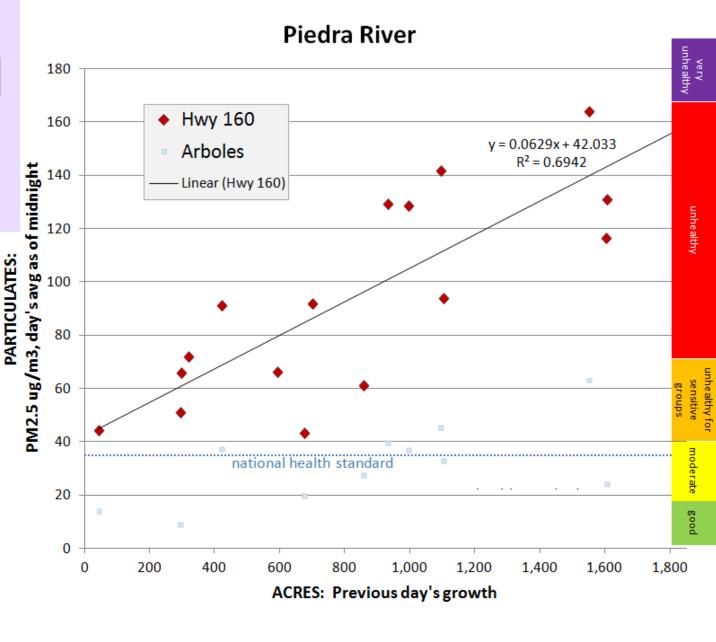
Why We Believe the High Reads

- Good field instruments, recently calibrated
- Comparing field visit photos to Denver hourly photos with measured PM (not included)
- Little Sand fire near Pagosa, mostly not suppressed, had very high PM (below)
- National monitoring data from fires, some prescribed, also high (below)

Little Sand Fire Use

- USFS Pagosa Springs District did all the monitoring work, voluntarily.
- District's overall management of Little Sand smoke was careful & highly responsible.
- Air in 'unhealthy' range for weeks
- Monitor in drainage 10(!) miles from fire
- Daily acres similar to 3a standard conditions

Little Sand data



- Instrument: NIFC cache eSampler; k-factor applied
- Highly favorable summer ventilation throughout

NIFC Monitors

- Cache monitors available to fed. land managers
- Data posted via satellite to a public website
- Examined non-summer days with low initial PM, probably prescribed rather than wildfire
- Data includes many days with readings well over level of the NAAQS

NIFC Monitors, PM2.5 Data

Location	Min. 24- hr avg	Full day of data?	Max. hour	Data date	Monitor ID
New York	58	n	1177	11/6/13	R9-17
Idaho	60	У	364	4/26/13	Smoke #13
Kentucky	14	n	77	4/3/13	Smoke #17
Alabama	62	n	321	4/24/13	Smoke #68
u	33	n	308	4/9/13	"
u	38	n	202	2/18/13	11

- Source: <u>www.wrcc.dri.edu</u>. The website has no data days for most states.
- .89 k-factor for eSamplers for smoke applied to all PM2.5 data; units are ug/m3
- Fuel types, acres per day, etc. unknown.
- 24-hr minimum averages assume 0 PM for all hours without data.

New Working Hypotheses

- A significant minority of burns create PM at homes above level of NAAQS.
 - 10% of understory burn days is a blind guess.
- We continue to think even large burns in brush and grass stay below NAAQS.
- Piles are even harder to guess about.
- Likely true nationwide

New Working Hypotheses, con't.

- Even little broadcast understory burns (>50 ac??) can generate PM over NAAQS level.
- If true, it can't be solved by tweaking permits.
 - Would have to cut standard acres by 92%

Three Critical Questions

- 1. What are the <u>legal boundaries</u> on APCD discretion to permit potentially high-PM burns?
- 2. If NAAQS aren't the upper limit, what is?
- 3. What must be <u>said to residents about</u> potential <u>health</u> impacts, by whom?